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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., et al.,

Plaintiffs,

v.

RIMINI STREET, INC., et al.,

Defendants.

Case No. 2:10-cv-00106-LRH-VCF

**DECLARATION OF ERIC D.
 VANDEVELDE IN SUPPORT OF
 RIMINI'S RESPONSE TO ORDER
 TO SHOW CAUSE**

Hearing:

Date: September 20, 2021
 Time: 9:00 a.m.
 Place: Bruce R. Thompson
 Courthouse, Reno, NV
 Judge: Hon. Larry R. Hicks

1 I, Eric D. Vandavelde, declare as follows:

2 1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and I am one
3 of the attorneys representing Rimini Street, Inc. in the above-captioned case. I submit this
4 declaration in support of Rimini's Response to Order to Show Cause. The facts stated in this
5 declaration are based on my personal knowledge, and if called upon as a witness, I would and
6 could testify competently to them.

7 2. Attached as **Exhibit A** is a true and correct copy of excerpts of an email chain
8 dated November 27, 2018, with production number RSI007050433. This document was
9 identified as Deposition Exhibit No. 1852 at the January 17, 2020 deposition of Craig
10 Mackereth.

11 3. Attached as **Exhibit B** is a true and correct copy of excerpts of an email chain,
12 the cited portion of which is dated January 18, 2019, with production number RSI007059711.

13 4. Attached as **Exhibit C** is a true and correct copy of excerpts of an email chain
14 dated January 25, 2019, with production number RSI007330441.

15 5. Attached as **Exhibit D** is a true and correct copy of a document entitled
16 "HCM200049_ApplyUpdateProcess.log" and dated January 29, 2019, with production number
17 RSI006972580. This document was produced in native format; the attached copy has been
18 printed to PDF.

19 6. Attached as **Exhibit E** is a true and correct copy of an email chain dated January
20 30, 2019, with production number RSI007328625.

21 7. Attached as **Exhibit F** is a true and correct copy of excerpts of an email chain
22 dated January 24, 2019, with production number RSI007075263.

23 8. Attached as **Exhibit G** is a true and correct copy of a document entitled "TECH
24 Client DOC Artifact" with production number RSI007330535.

25 9. Attached as **Exhibit H** is a true and correct copy of excerpts of an email chain
26 dated January 29, 2019, with production number RSI007074143.

27 10. Attached as **Exhibit I** is a true and correct copy of a document entitled
28 "HCM200049_ApplyUpdateProcess.log" and dated January 25, 2019, with production number

1 RSI006972589. This document was produced in native format; the attached copy has been
2 printed to PDF.

3 11. Attached as **Exhibit J** is a true and correct copy of a document entitled
4 “HCM200049_ApplyUpdateProcess.log” dated January 29, 2019, with production number
5 RSI006932244.

6 12. Attached as **Exhibit K** is a true and correct copy of a document entitled
7 “Financials and Supply Chain Management – Release for the United States – RS18F07 – Notes
8 Summary” produced by Easter Seals New Hampshire, Inc., with production number ESNHI3-
9 SUB00000612.

10 13. Attached as **Exhibit L** is a true and correct copy of excerpts and screenshots of
11 portions of electronic records FSCM100126_PUSS_1268_EAS,
12 FSCM100127_PUSS_1267_1269_EAS, and FSCM100130_100131_PUSS-1664_8.8_EAS,
13 relating to Easter Seals (EAS), from Rimini’s Spira database, to which Oracle had access during
14 discovery. To ensure that the screenshots were large enough to be legible, and to reduce bulk,
15 only screenshots of relevant portions of those digital records are encompassed in Exhibit L.

16 14. Attached as **Exhibit M** is a true and correct excerpted copy of a Software
17 License and Services Agreement between Peoplesoft USA, Inc. and Easter Seals New
18 Hampshire, Inc. dated June 27, 2003, with production number ORCLRS0665229.

19 15. Attached as **Exhibit N** is a true and correct copy of a screenshot of a portion of
20 electronic record PUSP-12669 – HCM200105 – US – Oregon Statewide Transit Payroll Tax
21 Quarterly Reporting Eff 2018-10-31, from Rimini’s internal Jira database, to which Oracle had
22 access during discovery.

23 16. Attached as **Exhibit O** is a true and correct copy of a document entitled
24 “HCM200105 Dev Instructions [Final],” dated July 19, 2019, with production number
25 RSI006953986. This document was produced in native format; the attached copy encompasses
26 the first two pages printed to PDF.

